

WWR# 21231179

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	CHAPTER NO. 13
SCOTTI SAWYER KERSHNER.	)	
EDWARD A. KERSHNER, JR.	)	BANKRUPTCY NO. 15-16109-jkf
Debtor	)	
	)	Nature of Proceeding
CITIZENS BANK, N.A.	)	Motion for Relief from Automatic Stay
Movant	)	
	)	Related to Document # 41

**PRAECIPE TO WITHDRAW MOTION FOR RELIEF FROM AUTOMATIC  
STAY**

CHECK ONE:

☒ The undersigned hereby withdraws the above identified pleading with the consent of the opposition, if any.

Dated 10/07/2016

/s/ Keri P. Ebeck  
Keri P. Ebeck  
Weltman, Weinberg & Reis Co. L.P.A.  
436 Seventh Avenue  
Suite 2500  
Pittsburgh, PA 15219  
Attorney for Movant

WWR# 21231179

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:  
SCOTTI SAWYER KERSHNER  
EDWARD A. KERSHNER, JR.  
Debtor

CITIZENS BANK, N.A.  
Movant

Case No. 15-16109-jkf

Chapter 13

**Hearing Date:**  
**Hearing Time:**

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Movant has filed a Praecipe to Withdraw Motion for Relief from Automatic Stay with the court for the real property located at 420 Tennis Avenue, Ambler, PA 19002.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before 10/24/2016 (17 Days from the date of the filing of this Motion) you or your attorney must do all of the following:

- (a) file an answer explaining your position at

U.S. Bankruptcy Clerk  
U.S. Bankruptcy Court  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the Movant's attorney:

Keri P. Ebeck  
Weltman, Weinberg & Reis Co., L.P.A.  
436 7th Avenue  
Suite 2500  
Pittsburgh, PA 15219  
(412) 434-7955  
(412) 434-7959/fax

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the Motion is scheduled to be held before the Honorable Jean K. FitzSimon, on \_\_\_\_\_, at \_\_\_\_\_ am, U.S. Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Suite 400, Philadelphia, PA 19107, Courtroom #3. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material, factual issues in the manner directed by Fed R. Bankr. P.9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: 10/07/2016

BY: /s/ Keri P. Ebeck  
KERI P. EBECK, ESQUIRE  
436 7th Avenue  
Suite 2500  
Pittsburgh, PA 15219  
(412) 434-7955 / (412) 434-7959  
Attorney for Movant

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IN RE:  
SCOTTI SAWYER KERSHNER  
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Debtor  
  
CITIZENS BANK, N.A.  
Movant

Case No. 15-16109-jkf  
Chapter 13  
Related to Document No. **41**  
**Hearing Date:**  
**Hearing Time:**

**CERTIFICATE OF SERVICE**

I, Keri P. Ebeck, Esquire, attorney for Movant, do hereby certify that true and correct copies of the Praecipe to Withdraw Motion for Relief from the Automatic Stay, with copies of the Notice of Motion, Response Deadline and Hearing Date relating thereto, have been served on the 7th day of October, 2016, by first class mail, postage prepaid from Pittsburgh, Pennsylvania, upon those listed below:

Scotti Sawyer Kershner, 420 Tennis Avenue, Ambler, PA 19002

Edward A. Kershner, Jr., 420 Tennis Avenue, Ambler, PA 19002

William D. Schreder, Jr., 920 Lenmar Drive, Blue Bell, PA 19422

William C. Miller, 1234 Market Street, Suite 1813, Philadelphia, PA 19107

Office of the U.S. Trustee, 833 Chestnut Street, Suite 500, Philadelphia, PA 19107

WELTMAN, WEINBERG & REIS CO., L.P.A.

BY: /s/ Keri P. Ebeck  
KERI P. EBECK, ESQUIRE  
436 7th Avenue  
Suite 2500  
Pittsburgh, PA 15219  
(412) 434-7955 / (412) 434-7959  
Attorney for Movant